

JUL 08 2005

JAMES W. McCORMACK, CLERK
By: *[Signature]* DEP CLERK

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
WESTERN DIVISION

DENNIS R. BURROW,)
vs.)
Plaintiff,) CIVIL ACTION NO.:
) 4:05-CV-0046-SWW
CONNECTICUT MUTUAL LIFE)
INSURANCE COMPANY a/k/a)
MASSACHUSETTS MUTUAL LIFE)
INSURANCE COMPANY, et al.)
Defendants.)

STIPULATION AND PROTECTIVE ORDER

Plaintiff Dennis R. Burrow and Defendants Massachusetts Mutual Life Insurance Company, United States Life Insurance Company, and Disability Reinsurance Management Services, Inc., parties in the above-styled action, by and through their undersigned attorneys, hereby agree and stipulate with regard to discovery in this action, which the parties acknowledge may involve substantial amounts of personal, confidential, technical, business, proprietary, and financial information:

1. As used herein, "Protected Discovery Materials" shall include all discovery (including documents produced by any party, written discovery responses, and depositions) other than documents which the producing party has disseminated to the general public (such as press releases and customer pamphlets) or which are disseminated to the general public by others (such as journal articles, abstracts, and government publications).

2. Any Protected Discovery Materials obtained in this action and the substance thereof, shall be subject to the following restrictions:

- a. Protected Discovery Materials shall be used only for the purpose of this litigation.
- b. Protected Discovery Materials shall not be given, shown, made available, or communicated in any way to anyone other than: (i) the attorneys of record for the parties in this litigation; (ii) those other persons to whom the attorneys of record decide it is necessary that the Protected Discovery Materials be shown for purposes of this litigation (expert witnesses, e.g.); and (iii) the Court, and, if the Court permits, the jury in this litigation.
- c. If the attorneys of record decide that it is necessary to show Protected Discovery Materials to other persons for purposes of this litigation, then the person to whom the Protected Discovery Materials are shown must also agree to be bound by the provisions of this order.

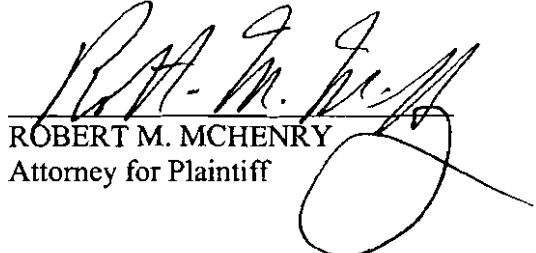
3. This order shall prevent any person from sharing with any other person or using in any other lawsuit or proceeding any Protected Discovery Materials (or the substance thereof) obtained in this proceeding, unless the providing party approves.

4. All Protected Discovery Materials and any copies thereof shall be returned to the producing party at the conclusion of this litigation.

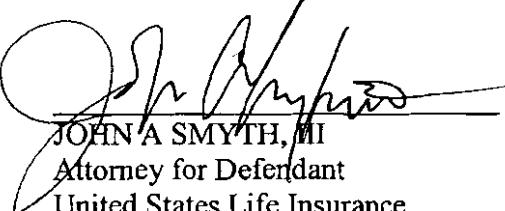
Dated this the 8th day of July, 2005.

Dana M. Lyle
DISTRICT COURT JUDGE

AGREED AND STIPULATED:



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Attorney for Plaintiff



JOHN A. SMYTH, III
Attorney for Defendant
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by REW
Steve Quattlebaum with permission
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